

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Donald J. Trump for President, Inc.,
Lawrence Roberts, and David John
Henry,

Plaintiffs,

v.

Kathy Boockvar, in her capacity as
Secretary of the Commonwealth of
Pennsylvania, Allegheny County Board
of Elections, Centre County Board of
Elections, Chester County Board of
Elections, Delaware County Board of
Elections, Montgomery County Board
of Elections, Northampton County
Board of Elections, and Philadelphia
County Board of Elections,

Defendants,

v.

DNC Services Corporation/Democratic
National Committee,

Proposed Intervenor-
Defendant.

No. 4:20-cv-02078-MWB
(Judge Matthew Brann)

PROPOSED INTERVENOR-DEFENDANT'S MOTION TO INTERVENE

Proposed Intervenor-Defendant DNC Services Corporation/Democratic National Committee moves for leave to participate in this action to defend its interests against the claims asserted by Plaintiffs. For the reasons discussed in the memorandum in support, Proposed Intervenor is entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative,

Proposed Intervenor requests permissive intervention pursuant to Rule 24(b).¹

WHEREFORE, Proposed Intervenor requests that the Court grant it leave to intervene in the above-captioned matter.

¹ Proposed Intervenor further seeks leave to file its proposed motion to dismiss in accordance with the Court's Scheduling Order issued on November 10, 2020. ECF No. 35; *see* Fed. R. Civ. P. 24(c).

Dated: November 11, 2020

Marc E. Elias*
Uzoma Nkwonta*
Lalitha D. Madduri*
John M. Geise*
PERKINS COIE LLP
700 Thirteenth St., N.W., Suite 800
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-9959
MElias@perkinscoie.com
UNkwonta@perkinscoie.com
LMadduri@perkinscoie.com
JGeise@perkinscoie.com

Respectfully submitted,

/s/ Clifford B. Levine
Clifford B. Levine (PA ID No. 33507)
Alex M. Lacey (PA ID No. 313538)
Kyle J. Semroc (PA ID No. 326107)
DENTONS COHEN & GRIGSBY P.C.
625 Liberty Avenue
Pittsburgh, PA 15222-3152
Telephone: (412) 297-4998
Clifford.levine@dentons.com
Alex.lacey@dentons.com
Kyle.semroc@dentons.com

Seth P. Waxman*
Ari Holtzblatt*
WILMER CUTLER PICKERING HALE
AND DORR LLP
1875 Pennsylvania Ave. N.W.
Washington, D.C. 20006
Telephone: (202) 663-6000
Seth.Waxman@wilmerhale.com
Ari.Holtzblatt@wilmerhale.com

Counsel for Proposed Intervenor

**Motions for Special Admission
Forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2020, I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Clifford B. Levine
Counsel for Proposed Intervenor

CERTIFICATE OF CONFERRAL

I hereby certify that on November 10, 2020, I conferred with counsel for Defendants' counsel as to their position on this motion. Defendants' counsel does not oppose this motion. On November 11, I attempted to confer with counsel for Plaintiffs but was unable to obtain their position on this motion.

/s/ Clifford B. Levine
Counsel for Proposed Intervenor